

**Before the  
FEDERAL COMMUNICATIONS COMMISSION  
Washington, D.C. 20554**

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| In the Matter of                            | ) |            |
|   | ) |            |
| Amendment of Part 97 of the Commission's    | ) |            |
| Amateur Radio Service Rules to Eliminate    | ) | RM - 10786 |
| Morse Code Proficiency Testing Requirements | ) |            |
| For All Classes of Amateur Licenses         | ) |            |
|   | ) |            |
| To: The Commission                          | ) |            |

Comments Of Jo Ann K. Seltzer – KC6TEA

I completely support No Code International's proposal to eliminate the Morse Code testing for all amateur radio operators licenses in our country as soon as possible. I would like to see those with current Technician operator licenses receive the same privileges as the current "Technician Plus license holders.

When the Commission lowered the Morse code requirement (WT Docket No. 98-143) to the current 5 words per minute, it allowed me, and others, to obtain advanced privileges, i.e., Amateur Extra, that I was unable to do before because of my inability to pass the higher Morse requirements. In my example I found it difficult to even find the interest in what seems to be an outdated mode. On the other hand, digital communications is far more appropriate. We have three children, ages 14 to 25 that are anxious to upgrade their skills and utilize more of the amateur radio spectrum, but are also challenged unduly by the Morse requirement.

I believe that the Commission indicated in WT Docket No. 98-143 that the public interest will best be served by reducing the (Morse) telegraphy examination requirement to the minimum requirement that meets the (ITU) Radio Regulations. The "minimum requirement that meets the ITU Radio Regulations" now, as of WRC03, is no Morse Code for any class of amateur license. Since the Commission is no longer bound to include Morse testing as part of the ITU Radio Regulations it can follow the example of other countries like the United Kingdom, Germany, Belgium, Switzerland, Norway, New Zealand, Austria and the Netherlands

The ability to send and receive Morse Code is not required for effective emergency radio communications by amateur radio operators. And, in these times, we should be encouraging new operators that can be trained for emergency communications and not discourage and confuse them by requiring them to demonstrate an ability in an outdated communications mode.

As others have noted, proficiency in Morse Code:

- Does not align itself with the basis and purpose of the Amateur Radio Service.
- It acts as a barrier to entry or advancement to otherwise qualified persons.
- It is not necessarily indicative of an individual's ability to contribute to the advancement of the radio art.

- It does not provide any indication of the examinee's good character, high intelligence, cooperative demeanor, or willingness to comply with the Commission's rules.
- It no longer continues to serve a regulatory purpose.
- It otherwise does not serve the public interest and necessity.

The Commission has the authority to amend its Part 97 rules to eliminate Morse proficiency requirements immediately. It considered the issue of continued Morse Code testing in WT Docket Number 98-143 where there was extensive input from the public and concerned parties, and to this date the only change from that consideration is that the only stated reason for retaining any Morse proficiency test has been removed (WRC-03).

By granting NCI's Petition, a roadblock for many applicants for amateur radio licenses would be removed, no additional requirement would be imposed, and therefore no party or other person would be prejudiced by such Commission action.

I trust that the Commission will in fact amend the rules as quickly as possible, and not combine NCI's request for the elimination of Morse test requirements with other issues such as band segmentation, changes in the number of license classes, sweeping changes in operator privileges by license class, etc., because that would result in unnecessary delays.

Sincerely,

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